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7 Attorney for Aaron Matson

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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 AARON MATSON,

15 Defendant.

Case No. 2:14-mj-794-CWH

**UNOPPOSED MOTION TO
ADVANCE SENTENCING HEARING
DATE**

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17 COMES NOW the defendant, AARON MATSON, by and through his attorney of
18 record, Monique Kirtley, Assistant Federal Public Defender, who moves this court to advance
19 his sentence hearing date currently scheduled for January 9, 2018, at the hour of 10:00 a.m.; be
20 advanced as soon as possible, or to a date and time convenient to this Court. This motion is
21 based on all prior proceedings had herein and the attached memorandum of points and
22 authorities and moves this Court to reopen his detention hearing based upon changed
23 conditions.
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1 **MEMORANDUM OF POINTS & AUTHORITIES**

2 **FACTS**

3 On June 15, 2017, Mr. Matson appeared in court for a Probation Revocation Hearing.
4 Mr. Matson admitted to violating allegations in paragraphs one through four. The parties
5 requested that Mr. Matson's sentencing be held in abeyance for six months. Mr. Matson was
6 continued on his previous terms and conditions of supervision. Additionally, his supervision
7 was modified to have him report to his supervising probation officer on a monthly basis.
8 Mr. Matson's sentence was continued to January 9, 2018.

9 Mr. Matson is scheduled to complete his Nevada state term of probation on September
10 27, 2017. See Exhibit A: Letter of Compliance. Undersigned counsel confirmed with
11 Mr. Matson's United States Probation Officer, Jodona Brown that he is in full compliance with
12 his federal probation. Mr. Matson is requesting that his sentence date be advanced due to a new
13 out of state employment opportunity. Matson has received a job offer with a company called
14 Mallows. Mr. Matson and his family are very excited about this job offer. Mr. Matson will be
15 able to make \$40,00.00 a year more than what he is making now. The salary increase is
16 extremely beneficial to Mr. Matson because he is still the primary bread winner of the family.
17 However, the new job opportunity will require that Mr. Matson and his family move to
18 Bullhead, Arizona. Mr. Matson pending sentencing will determine if he will have to forgo this
19 new job opportunity or if he will be able to tell Mallows that he can accept the offer.

20 Mr. Matson respectfully requests his sentence hearing date be advanced as soon as
21 possible. Undersigned counsel has contacted AUSA Patrick Burns and USPO Jodona Brown
22 and they have no objection to advancing his sentencing date.

1 DATED this 25th day of September, 2017.

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3 RENE L. VALLADARES
4 Federal Public Defender

5 /s/ *Monique Kirtley*
6 By _____
7 MONIQUE KIRTLEY
8 Assistant Federal Public Defender
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1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 AARON MATSON,

7 Defendant.

Case No. 2:14-mj-794-CWH

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 Tuesday, January 9, 2018 at 10:00 a.m., be vacated and advanced to September 28, 2017,
12 at 8:30 a.m.

13 DATED September 26, 2017

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17 UNITED STATES MAGISTRATE JUDGE
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